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## I. 510(k) SUMMARY OF SAFETY AND EFFECTIVENESS

Greiner Meditech, Inc. ("Greiner") is submitting a 510(k) premarket notification for its Greiner MiniCollect<sup>®</sup> EDTA tube with EDTA K<sub>3</sub> for capillary blood collection. The Greiner MiniCollect<sup>®</sup> EDTA K<sub>3</sub> tube is a non-sterile, non-evacuated blood collection device containing EDTA K<sub>3</sub> anticoagulant additive, and is intended for use in evaluations of capillary blood specimens.

Greiner is claiming substantial equivalence to Becton Dickinson's Microtainer® EDTA K<sub>2</sub> tube (K940905). Both blood collection tubes have the same intended use and are made out of the same material, polypropylene plastic. The Becton Dickinson Microtainer® EDTA tube uses EDTA K<sub>2</sub> as an additive, while the Greiner MiniCollect® EDTA tube uses EDTA K<sub>3</sub> as an additive. The Greiner MiniCollect® tube cap is made from rubber and has "cross-cuts" to allow for direct collection into and sampling from the tube without having to remove the cap. The Becton Dickinson Microtainer® Brand EDTA tube caps are made of polyethylene. The equivalency of assay results for both tubes was evaluated by testing paired samples collected in Greiner MiniCollect® EDTA K<sub>3</sub> tubes and Becton Dickinson Microtainer® Brand EDTA K<sub>2</sub> tubes. Test results from paired samples for 15 hematology parameters and lead tests were evaluated and good correlation was observed.

Greiner's 510(k) has been submitted on August 27, 1998 by Doug Harris, Managing Director, Greiner Meditech, Inc., 260 Gateway Drive, Suite 17A, Bel Air, MD 21014 (410/836-8228).



Food and Drug Administration 2098 Gaither Road Rockville MD 20850

## OCT | 6 1998

Douglas L. Harris
Managing Director
Greiner Meditech, Inc.
260 Gateway Drive, Suite 17A
P.O. Box 943
Bel Air, Maryland 21014

Re: K982999

MiniCollect® EDTA K3 Blood Collection Tube

Regulatory Class: II Product Code: JKA

Dated: August 27, 1998 Received: August 27, 1998

Dear Mr. Harris:

We have reviewed your Section 510(k) notification of intent to market the device referenced above and we have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act). You may, therefore, market the device, subject to the general controls provisions of the Act. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration.

If your device is classified (see above) into either class II (Special Controls) or class III (Premarket Approval), it may be subject to such additional controls. Existing major regulations affecting your device can be found in the <u>Code of</u> Federal Regulations, Title 21, Parts 800 to 895. A substantially equivalent determination assumes compliance with the Current Good Manufacturing Practice requirements, as set forth in the Quality System Regulation (QS) for Medical Devices: General regulation (21 CFR Part 820) and that, through periodic QS inspections, the Food and Drug Administration (FDA) will verify such assumptions. Failure to comply with the GMP regulation may result in regulatory In addition, FDA may publish further announcements concerning your device in the Federal Register. Please note: this response to your premarket notification submission does not affect any obligation you might have under sections 531 through 542 of the Act for devices under the Electronic Product Radiation Control provisions, or other Federal laws or regulations.

Under the Clinical Laboratory Improvement Amendments of 1988 (CLIA-88), this device may require a CLIA complexity categorization. To determine if it does, you should contact the Centers for Disease Control and Prevention (CDC) at (770) 488-7655.

This letter will allow you to begin marketing your device as described in your 510(k) premarket notification. The FDA finding of substantial equivalence of your device to a legally marketed predicate device results in a classification for your device and thus, permits your device to proceed to the market.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801 and additionally 809.10 for in vitro diagnostic devices), please contact the Office of Compliance at (301) 594-4588. Additionally, for questions on the promotion and advertising of your device, please contact the Office of Compliance at (301) 594-4639. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21 CFR 807.97). Other general information on your responsibilities under the Act may be obtained from the Division of Small Manufacturers Assistance at its toll-free number (800) 638-2041 or (301) 443-6597 or at its internet address "http://www.fda.gov/cdrh/dsmamain.html".

Sincerely yours,

Steven I. Gutman, M.D., M.B.A. Director Division of Clinical Laboratory Devices Office of Device Evaluation Center for Devices and Radiological Health

Enclosure

## STATEMENT OF INDICATIONS FOR USE

510(k) Number (if known): <u>1982 999</u>	
Device Name:	MiniCollect® EDTA K <sub>3</sub> Blood Collection Tube
Indications for Use:	To collect, transport, store, and evaluate capillary blood specimens for hematology and lead tests.
	(Division Sign-Off) Division of Clinical Laboratory Devices 510(k) Number 498999
Prescription Use X	Over-The-Counter Use
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